

FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-7377

FACILITY NAME: OCEAN BEAUTY SEAFOODS, INC.

GENERAL INFORMATION	
Applicant	Diane Miller, Manager
Facility Name and Address	Ocean Beauty Seafoods, Inc. 14651 172 nd Drive SE Monroe, WA 98272
Type of Facility	Seafood Processing, SIC 2091
Facility Discharge Location	Latitude: 47° 51' 59" N Longitude: 122° 00' 14" W
Treatment Plant Receiving Discharge	City of Monroe Wastewater Treatment Plant WA00-2048-6
Contact at Facility	Diane Miller, Manager Tamara Hedrick, QA Manager 425-483-1177
Responsible Official	Jim Yonker, Director of Corporate QA 1100 W. Ewing Street Seattle, WA 98107 Telephone # 425-483-1177 FAX # 360-794-9312

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-7377. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of seafood process wastewater to the City of Monroe Wastewater Treatment Plant. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the State include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. Changes to the permit will be addressed in Appendix C—Response to Comments.

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Ocean Beauty Seafoods, Inc., is located in the city of Monroe in an industrial park. They are currently located in a building that was built for pasta processing. Ocean Beauty began operation here in early 2000. All wastewater flows through slotted floor drains and into an outside vault with a 600-gallon capacity.

HISTORY

Ocean Beauty Seafoods, Inc., was formerly located at 17361 Tye Street SE, in Monroe, and permitted under the name Circle Sea Seafoods, Ltd. A State Waste Discharge Permit was issued March 8, 1996, regulating the discharge of screened seafood processing wastewater to the City of Monroe Wastewater Treatment Plant. That permit was renewed August 10, 1999. The permit was modified July 12, 2000, changing the company name to Ocean Beauty Seafoods, Inc., and changing the facility address to reflect the current location.

INDUSTRIAL PROCESSES

Gutted, cleaned, and iced or frozen salmon and trout arrive at the Monroe facility for further processing. The fish are thawed, split, salted, cut, brined, smoked, and packaged. The finished product, smoked fish, is sliced, packaged, and frozen.

Raw materials used in the process are salmon and trout, salt, sugar, and spices. About 8,000 pounds of fish per day are smoked, yielding about 4,500 pounds per day of finished product.

A total maximum of 45,000 gallons per day of water is used (based on permit application information). The City of Monroe data for 2004 indicates a total water usage for the facility as between 25,000 and 30,000 gallons per day. Waste water is created primarily from clean-up operations. About 18 to 20 totes a day of used brine are dumped to the floor drains, equaling about 100 gallons per day of concentrated brine.

This facility operates 5 days per week, between 7 am and 5 pm.

This is a permit renewal and therefore Ocean Beauty Seafoods is not considered a new source discharger.

TREATMENT PROCESSES

Wastewater treatment consists of coarse screening via floor drains, solids settling in an outside sump, then discharge to the City of Monroe Wastewater Treatment Plant. Solids collected on the floors and floor screens are placed in a bin and picked up for rendering. The solids are vacuumed out of the 600-gallon sump by a commercial vac truck company.

PERMIT STATUS

The previous permit for this facility was issued on August 10, 1999.

An application for permit renewal was submitted to the Department on February 24, 2004, and accepted by the Department on June 22, 2004.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on March 4, 2004.

During the history of the previous permit, the Permittee has remained in compliance based on discharge monitoring reports (DMRs) and other reports submitted to the Department and inspections conducted by the Department. Flow values have been grossly underreported because of inaccurate meter recording and calculations. This problem was discovered by the City of Monroe and corrections were made.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The proposed wastewater discharge is characterized for the following parameters (based on the past 18 months of DMR data):

Parameter	Range	Average Value
Flow	26,000-30,000* gpd	28,354 gpd *Based on total water usage provided by City of Monroe
BOD ₅	101-561 mg/L	297 mg/L
Chloride	20-2294 mg/L	619 mg/L
Oil and Grease	9-98 mg/L	36 mg/L
Total Suspended Solids	40-255 mg/L	109 mg/L
pH	7.7-9.4 std units	8.73 standard units

SEPA COMPLIANCE

This is an existing facility and, therefore, SEPA is not required.

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Federal categorical limitations specifically applicable to raw material already cleaned and frozen do not exist. There are no pretreatment limitations for new or existing sources discharging to a sanitary sewer system listed in 40 CFR Part 408, for this industry. The following permit limitations are necessary to satisfy the requirement for AKART:

All process wastewater, including clean-up water, must be screened through coarse screening followed by fine screening and solids settling prior to discharge to the City of Monroe WWTP. Wastewater samples shall be taken after screening.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the City of Monroe Wastewater Treatment Plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the City of Monroe WWTP and codified in ordinance (No. 011/2004). Applicable limits for this discharge include the following:

Any discharge which imparts color which cannot be removed by the POTW's treatment process such as dye wastes and vegetable tanning solutions, which consequently impart color to the treatment plant's effluent, thereby violating the City of Monroe NPDES permit. Color (in combination with turbidity) shall not cause the treatment plant effluent to reduce the depth of the compensation point for photosynthetic activity in the receiving waters by more than 10 percent from the seasonably established norm for aquatic life.

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED AUGUST 10, 1999

Parameter	Existing Limits	Proposed Limits
Flow, gpd	45,000	45,000
Oil and Grease, mg/L	100	100
pH, standard units	5.5 – 9.5	5.5 – 9.5

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Conditions S2 and S3. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monthly monitoring is required in this permit to more accurately assess the loadings to the Monroe WWTP.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 173-216-110 and 40 CFR 403.12 (e), (g), and (h)].

OPERATIONS AND MAINTENANCE

The proposed permit contains Condition S.5 as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee update the existing Solid Waste Control Plan designed to prevent solid waste from causing pollution of the waters of the state and submit it to the Department.

NONROUTINE AND UNANTICIPATED DISCHARGES

Occasionally, this facility may generate wastewater which is not characterized in their permit application because it is not a routine discharge and was not anticipated at the time of application. These typically are waters used to pressure test storage tanks or fire water systems or leaks from drinking water systems. These are typically clean waste waters but may be contaminated with pollutants. The permit contains an authorization for nonroutine and unanticipated discharges. The permit requires a characterization of these waste waters for pollutants and examination of the opportunities for reuse. Depending on the nature and extent of pollutants in this waste water and opportunities for reuse, Ecology may authorize a direct discharge to the municipality, require the waste water to be placed through the facilities wastewater treatment process or require the water to be reused.

SLUG DISCHARGE CONTROL PLAN

The Department has determined that the Permittee has the potential for a batch discharge or a spill that could adversely effect the POTW; therefore, a Slug Discharge Control Plan is required [40 CFR 403.8 (f)].

GENERAL CONDITIONS

General Conditions are based directly on State laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending, or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes, or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with pretreatment standards or requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for a term of five (5) years.

REFERENCES FOR TEXT AND APPENDICES

Washington State Department of Ecology.

Laws and Regulations (<http://www.ecy.wa.gov/laws-rules/index.html>)

Permit and Wastewater Related Information

(<http://www.ecy.wa.gov/programs/wq/wastewater/index.html>)

State Waste Discharge Permit Application, submitted February 11, 2004.

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page one of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Because there were no significant changes in this permit from the previous permit, the application and draft permit were not Public Noticed.

APPENDIX B—GLOSSARY

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)—Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the state. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅—Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling—A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling—A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be “time-composite” (collected at constant time intervals) or “flow-proportional” (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

Construction Activity—Clearing, grading, excavation, and any other activity which disturbs the surface of the land. Such activities may include road building; construction of residential houses, office buildings, or industrial buildings; and demolition activity.

Continuous Monitoring—Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short a period of time as is feasible.

Industrial User—A discharger of waste water to the sanitary sewer which is not sanitary waste water or is not equivalent to sanitary waste water in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic waste water. These wastes may result from any process or activity of industry, manufacture, trade or business; from the development of any natural resource; or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference—A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and
- Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act [RCRA], and including State regulations contained in any State sludge management plan prepared pursuant to Subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)—The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through—A discharge which exits the POTW into waters of the state in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase

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in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User—A potential significant industrial user is defined as an industrial user which does not meet the criteria for a significant industrial user, but which discharges waste water meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day; or
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass-through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)—A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)—

1. All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; and
2. Any other industrial user that: discharges an average of 25,000 gallons per day or more of process waste water to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with 40 CFR 403.8(f)(6)].

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of nondelegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a nonroutine, episodic nature, including but not limited to an accidental spill or a noncustomary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the State of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Suspended Solids (TSS)—Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C—RESPONSE TO COMMENTS